

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal),  
EPA ICR Number 2066.05, OMB Control Number 2060-0483

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) were proposed on May 14, 2002 (67 FR 34547), and promulgated on May 27, 2003 (68 FR 28785). This standard applies to any new or reconstructed engine test cells/stands located at major source facilities that are being used for testing internal combustion engines with a rated power of 25 horsepower (hp) or more. An engine test cell/stand is any apparatus used for testing uninstalled stationary or uninstalled mobile (motive) engines. A plant site that is a major source of hazardous air pollutant (HAP) emissions emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year. These new or reconstructed sources must be in compliance with the requirements of the engine test cells/stands NESHAP upon the startup of a new or reconstructed engine test cell/stand.

Owners and operators must submit an initial notification report upon the construction, or reconstruction of any engine test cells/stands used for testing internal combustion engines. For new or reconstructed engine test cells/stands that startup before the effective date of this subpart, the initial notification is due no later than 120 calendar days after the effective date of the subpart. For new or reconstructed engine test cells/stands with startup on or after the effective date of this subpart, the initial notification is due no later than 120 calendar days after the source becomes subject to this subpart.

The respondents are required to submit a semiannual compliance report. If there were no deviations from the emission limitation and the continuous emission monitoring system (CEMS) is operating correctly, the semiannual report must contain a statement by a responsible official that no deviation occurred during the reporting period and that no CEMS or continuous parameter monitoring system (CPMS) was out of control. If a deviation occurred from an emission limit, the report must contain detailed information of the nature of the deviation. Respondents of affected sources must submit a notification of compliance status, certifying that they have complied with the standard. In addition, the affected sources are required to use CEMS to monitor compliance with the standard and to conduct a performance evaluation of the CEMS.

Any owner or operator subject to the provisions of this part will maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. Each file will be on the site for at least two years after the date of each occurrence, measurement, maintenance, report or record and off-site for the remaining three years. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

Approximately 18 respondents are currently subject to the regulation, and it is estimated that no additional respondents per year will become subject to the regulation in the next three years.

There are approximately 18 engine test cells/stands facilities in the United States, which are owned and operated by the engine test cells industry. None of the 18 facilities in the United States are owned by state, local, tribal or the Federal government. They are owned and operated by privately owned for-profit businesses. You can find the burden to the “Affected Public” listed below in Table 1: Annual Respondent Burden and Cost - NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal). The Federal government burden does not include work performed by Federal employees. The burden refers only to work performed by contractors, which could be found listed below in Table 2: Average Annual EPA Burden and Cost - NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

In the development of the ICR, we addressed the Office of Management and Budget (OMB) “Terms of Clearance (TOC)” on the active ICR. The TOC are as follows:

When this ICR is renewed, EPA should review the respondent burden, universe, labor rates, and capital costs and ensure these estimates have been updated.

EPA has addressed each item of concern in the TOC. The respondent burden, universe, labor rates, and capital cost have been thoroughly checked, and all estimates updated.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants (HAP). These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

- (A) Establish and maintain such records;
- (B) make such reports;
- (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods;
- (D) sample such emissions (in

accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from engine test cells/stands cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart P.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. In addition, the collected information is used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate the control equipment in compliance with the regulation.

### **3. Non-duplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart P.

#### **3(a) Non-duplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated

state or local agency. If a state or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

### **3(b) Public Notice Required Prior to ICR Submission to OMB**

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (76 FR 26900) on May 9, 2011. No comments were received on the burden published in the Federal Register.

### **3(c) Consultations**

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted the Engine Manufacturers Association at (312) 827-8734, and the National Marine Manufacturers Association at (202) 737-9757.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice.

### **3(d) Effects of Less Frequent Collection**

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

### **3(e) General Guidelines**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with

the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. Without the five-year record retention, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

### **3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### **3(g) Sensitive Questions**

None of the reporting or recordkeeping requirements contain sensitive questions.

## **4. The Respondents and the Information Requested**

### **4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements are engine test cells/stands. The United States Standard Industrial Classification (SIC) codes which correspond to the North American Industry Classification System (NAICS) codes are listed below for each source category description.

<b>40 CFR part 63, subpart P</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Turbine and Turbine Generator Set Units Manufacturing	3511	333611
Other Engine Equipment Manufacturing	3519	333618
All Other Motor Vehicle Parts Manufacturing	3519	336399
Hand and Edge Tool Manufacturing	3523	332212
Lawn and Garden Tractors and Home Lawn and Garden Equipment Manufacturing	3524	333112
Hand and Edge Tool Manufacturing	3524	332212
Construction Machinery Manufacturing	3531	333120
Farm Machinery and Equipment Manufacturing	3559	333111
Other Commercial and Service Industry Machinery Manufacturing	3559	333319
Speed Changers, Industrial High-Speed Drives, and Gears Manufacturing	3566	333612
Motors and Generator Manufacturing	3621	335312
Automobile Manufacturing	3711	336111

<b>40 CFR part 63, subpart P</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Heavy Duty Truck Manufacturing	3711	336120
Light Truck and Utility Vehicle Manufacturing	3711	336112
Military Armored Vehicle, Tank, and Tank Component Manufacturing	3711	336992
Gasoline Engine and Engine Parts Manufacturing	3714	336312
Motor Vehicle Transmission and Power Parts Manufacturing	3714	336350
Aircraft Manufacturing	3721	336411
Research and Development in the Physical, Engineering, and Life Sciences	3721	541710
Aircraft Engine and Engine Parts Manufacturing	3724	336412
Research and Development in the Physical, Engineering, and Life Sciences	3724	541710
Guided Missile and Space Vehicle Manufacturing	3761	336414
Research and Development in the Physical, Engineering, and Life Sciences	3761	541710
Guided Missile and Space Vehicle Propulsion Unit and Propulsion Unit Parts Manufacturing	3764	336415
Research and Development in the Physical, Engineering, and Life Sciences	3764	541710
Scheduled Passenger Air Transportation	4512	481111
Other Support Activities for Air Transportation	4581	488190
Research and Development in the Physical, Engineering, and Life Sciences	8731	541710
Testing Laboratories	8734	541380
Automobile Driving Schools	8299	611692
General Automotive Repair	7538	811111
Other Automotive Mechanical and Electrical Repair and Maintenance	7539	811118
Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance	7699	811310
Home and Garden Equipment Repair and Maintenance	7699	811411
Space Research and Technology	9661	927110
National Security	9711	928110

#### **4(b) Information Requested**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

**(i) Data Items**

In this ICR, all the data recorded or reported is required by National Emission Standards for Hazardous Air Pollutants for Engine Test Cells/Standards (40 CFR Part 63, Subpart P).

A source must make the following reports:

<b>Notifications</b>	
Initial notification	63.9345 (b), 63.5(d), 63.9(b)
Notification of compliance status	63.9345(c), 63.9(h)
Notification of intent to conduct CEMS performance evaluation	63.9345(d), 63.8(e)(2)
Initial performance evaluation	63.9320(b), 63.9345(d), 63.8(e)(2)
Notification of alternative monitoring method	63.8(f)(4)
Waiver of recordkeeping or reporting requirements	63.10(f)
Additional notification	63.8(e), 63.8(f)(4), 63.8(f)(6), 63.9(b), 63.9(g)(1), 63.9(g)(2), 63.9(h), 63.9(j)
Semiannual compliance report	63.9340(b), 63.9350(a), 63.9350(b), 63.9350(c), 63.9350(d), 63.10(a), 63.10(e)

A source must keep the following records:

<b>Recordkeeping</b>	
Maintain records of emission test results and other data needed to determine compliance with emission limitation	63.9355(a)(5), 63.9355(a)(6), 63.9355(a)(7)
Maintain records of all reports and notifications	63.9355(a), 63.9350, 63.10(b)
Maintain records of applicability	63.10(b)(3)
Maintain records for sources with continuous monitoring systems	63.9355(a)(2), 63.9355(b), 63.9355(c), 63.10(b), 63.10(c)
Maintain records for initial notification and notification of compliance status	63.9355(a)(1), 63.10(b)(2)(xiv)

**Electronic Reporting**

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies, in cooperation with the respondents, continue to create reporting systems to transmit data electronically. However, electronic reporting systems are not

widely used. At this time, it is estimated that approximately 10 percent of the respondents are reporting electronically.

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate CEMS for opacity.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

**5. The Information Collected: Agency Activities, Collection Methodology, and Information Management**

**5(a) Agency Activities**

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

**5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was



achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. EPA edits, stores, retrieves, and analyzes the data.

The records required by this regulation must be retained by the owner or operator for five years.

### **5(c) Small Entity Flexibility**

All of the current respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost - NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

## **6. Estimating the Burden and Cost of the Collection**

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 3,043 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the

regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

## **6(b) Estimating Respondent Costs**

### **(i) Estimating Labor Costs**

Managerial	\$118.92 (\$56.63 + 110%)
Technical	\$97.78 (\$46.56 + 110%)
Clerical	\$48.76 (\$23.22 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2010, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

### **(ii) Estimating Capital/Startup and Operation and Maintenance Costs**

The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

### **(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs**

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent <sup>1</sup>	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
CPMS	\$500	0	\$0	\$300	18	\$5,400
			\$0			\$5,400

<sup>1</sup> It is assumed that each new or reconstructed facility will purchase five thermocouples at a cost of \$100 per thermocouple for a total cost of \$500 per facility.

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$5,400. This is the total of column G

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$5,400.

### 6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA compliance and enforcement program includes activities such as: the examination of records maintained by the respondents; periodic inspection of sources of emissions; and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$8,043.

This cost is based on the average hourly labor rate as follows:

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2011 General Schedule, which excludes locality rate of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost- NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

### 6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, approximately 18 respondents will be subject to the standard. It is estimated that no new respondents per year will become subject to the standard. The overall average number of respondents, as shown in the table below is 18 per year.

The number of respondents is calculated using the following table which addresses the three years covered by this ICR.

Number of Respondents					
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	18	N/A	0	18
2	0	18	N/A	0	18
3	0	18	N/A	0	18
Average	0	18	N/A	0	18

<sup>1</sup> New respondents include sources with constructed, reconstructed, and modified affected facilities.

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 18.

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C)+D$
Compliance status report	18	2	0	36
Performance evaluation report	2	1	0	2
Deviation report	1	2	0	2
Total Number of Annual Responses			Total	40

The number of Total Annual Responses is 40.

The total annual labor costs are \$288,361. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

#### **6(e) Bottom Line Burden Hours Burden Hours and Cost Tables**

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

##### **(i) Respondent Tally**

The total annual labor hours are 3,043. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 76 hours per response.

The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are \$5,400.

##### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 178 labor hours at a cost of \$8,043. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

**6(f) Reasons for Change in Burden**

There is no increase in the number of affected facilities or the number of responses as compared to the previous ICR. There is, however, an increase in the estimated burden cost as currently identified in the OMB Inventory of Approved Burdens. The increase is not due to any program changes. The change in burden cost is due to the use of the most updated labor rates.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 76 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; to develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; to complete and review the collection of information; and to transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2011-0203. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, N.W., Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2011-0203 and OMB Control Number 2060-0483 in any correspondence.

**Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this

information.

**Table 1: Annual Respondent Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions <sup>c</sup>	4	1	4	0	0	0	0	\$0
B. Notifications <sup>c</sup>								
Initial notifications	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Compliance status report <sup>d</sup>	4	2	8	18	144	7.2	14.4	\$15,638.68
Performance evaluation report <sup>e</sup>	16	1	16	2	32	1.6	3.2	\$3,475.26
Deviation report <sup>f</sup>	16	2	32	1	32	1.6	3.2	\$3,475.26
Subtotal for Reporting Requirements						239.2		
4. Recordkeeping requirements								
A. Initial performance evaluation <sup>g, h, i</sup>	330	1	330	2	660	33	66	\$71,677.32
B. Monitoring demonstration <sup>g, h, i</sup>	148	1	148	2	296	14.8	29.6	\$33,146.20
C. Repeat performance evaluation <sup>g, h, j</sup>	330	1	330	0.4	132	6.6	13.2	\$14,335.46
D. Maintain records of CEMS performance <sup>k</sup>	1.5	50	75	18	1,350	67.5	135	\$146,612.70
Subtotal for Recordkeeping Requirements						2,803.7		
					2,646	132.3	264.6	\$288,360.88
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						3,042.9		\$288,361
						3,043		

**Assumptions:**

<sup>a</sup> We have assumed that the average number of existing sources subject to the rule will be 18. There will be no additional new sources per year that will become subject to the rule over the three-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$118.92 per hour for Executive, Administrative, and Managerial labor; \$97.78 per hour for Technical labor, and \$48.76 per hour for

Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December, 2010, Table 2. Civilian Workers, by Occupational and Industry group. The rates are from column 1, Total Compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that there will be no new or reconstructed sources over the next three years.

<sup>d</sup> We have assumed that compliance status reports are required semiannually.

<sup>e</sup> We have assumed that 10 percent will have to write a performance evaluation report once a year.

<sup>f</sup> We have assumed that one of the eighteen sources will have to write a deviation report.

<sup>g</sup> We have assumed that all 18 sources are in compliance.

<sup>h</sup> The technical persons-hours per occurrence were taken from the ESD manual Table 4 "Burden of Performance Tests and Continuous Monitoring System (CMS) Demonstrations" (Volume X, Section 2.2).

<sup>i</sup> We have assumed that performance evaluations and monitoring demonstrations will occur every five years. According to calculations the fifth year will fall on the first year of this renewal ICR, thus the requirements will only pertain to six facilities of the active ICR. Therefore, six facilities averaging over three years  $(6 \times 3) = 2/\text{yrs}$ .

<sup>j</sup> We have assumed that 20 percent of respondents will have to repeat the performance evaluations due to failure.

<sup>k</sup> We have assumed that owners and operators will have to maintain monitoring records on a weekly basis.



**Table 2: Average Annual EPA Burden and Cost- NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart P) (Renewal)**

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
1. Attend CEMS performance evaluation	32	1	32	0	0	0	0	\$0
2. Repeat performance evaluation								
a. Retesting preparation	12	1	12	0	0	0	0	\$0
b. Attend retesting	32	1	32	0	0	0	0	\$0
3. Deviation – enforcement activities <sup>c</sup>	16	1	16	3.6	57.6	2.88	5.76	\$2,985.10
4. Reporting requirements								
a. Review regulation	2	2	4	0	0	0	0	\$0
b. Review waivers	2	2	4	0	0	0	0	\$0
c. Review reports								
Review initial notification	2	1	2	0	0	0	0	\$0
Compliance status report <sup>d,e</sup>	2	2	4	14.4	57.6	2.88	5.76	\$2,985.10
Performance evaluation report <sup>f</sup>	2	1	2	18	36	1.8	3.6	\$1,865.69
Deviation report <sup>g</sup>	2	2	4	1	4	0.2	0.4	\$207.29
Subtotals Labor Burden and cost					155.2	7.76	15.52	\$8,043.18
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>						178.48 178 (rounded)		\$8,043

**Assumptions:**

<sup>a</sup> We have assumed that the average number of existing sources subject to the rule will be 18 and that no additional new sources will become subject to the rule over the three-year period of this ICR.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 Managerial rate (GS-13, Step 5, \$38.92 x 1.6), \$46.21 Technical rate (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 Clerical rate (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2011 General Schedule which excludes locality rates of pay.

<sup>c</sup> We have assumed that 20 percent of respondents will be out of compliance.

<sup>d</sup> We have assumed that 80 percent of respondents will be in compliance.

<sup>e</sup> Compliance status reports review is required semiannually.

<sup>f</sup> We have assumed that owners and operators are required to review performance evaluation reports once a year.

<sup>g</sup> We have assumed that one respondent will have their deviation report reviewed on a semiannual basis.